

KML LAW GROUP, P.C.

A Professional Corporation incorporated in Pennsylvania

216 Haddon Avenue, Ste. 406

Westmont, NJ 08108

(215) 627-1322

Attorneys for Specialized Loan Servicing LLC as servicer for MTGLQ Investors, L.P.

IN THE MATTER OF:

Brett A. Rovani

DEBTOR(S),
Michele M. Rovani

CO-DEBTOR

**IN THE UNITED STATES
BANKRUPTCY COURT FOR THE
DISTRICT OF NEW JERSEY**

CHAPTER 13
CASE NO. 18-28721 JNP

**NOTICE OF MOTION FOR RELIEF
FROM STAY & CO-DEBTOR STAY**

TO:

Brett A. Rovani
149 Windsor Way
Mount Royal, NJ 08061

Michele M. Rovani
149 Windsor Way
Mount Royal, NJ 08061

Richard S. Hoffman Jr.
Hoffman DiMuzio
412 Swedesboro Road
Mullica Hill, NJ 08062

Isabel C. Balboa Esq.
Chapter 13 Standing Trustee
Cherry Tree Corporate Center - 535 Route 38 - Suite 580
Cherry Hill, NJ 08002

US TRUSTEE
Office of the US Trustee
One Newark Center, Suite 2100
Newark, NJ 07102

PLEASE TAKE NOTICE THAT the undersigned attorney for **Specialized Loan Servicing LLC as servicer for MTGLQ Investors, L.P.**, will apply to the UNITED STATES BANKRUPTCY COURT, located at **401 Market Street, P.O. Box 2067; Camden, NJ**, for an Order to Grant Relief from the Automatic Stay & Co-Debtor to authorize the moving parties to prosecute a foreclosure action for the reason that the debtors and Michele M. Rovani, Co-Debtor have failed to maintain their monthly mortgage payments to the Secured Creditor as more particularly set forth in the certification submitted herewith. Costs and counsel fees will also be requested.

The property involved is known as **149 Windsor Way , Mount Royal NJ 08061**. The hearing on this matter is scheduled for **June 25, 2019 at 10:00 A.M.**

Dated: May 31, 2019

/s/Denise Carlon, Esq.

Brian C. Nicholas, Esquire

Denise Carlon, Esquire

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